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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC,

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD
L.P.,

Defendants.

Case No. 3:23-cv-06522-MMC

**DEFENDANTS INTERNET ARCHIVE,
KAHLE, KAHLE/AUSTIN FOUNDATION,
BLOOD, AND GEORGE BLOOD L.P.'S
NOTICE OF ERRATA TO OPPOSITION TO
PLAINTIFFS' MOTION TO COMPEL
DISCOVERY (ECF No. 139) AND
STILLMAN DECLARATION (ECF No. 139-
1)**

Date: December 19, 2024

Time: 9:30 a.m.

Place: Courtroom B, 15th Floor

Judge: Hon. Laurel Beeler

TO THE COURT, ALL PARTIES AND THEIR COUNSEL:

Defendants Internet Archive, Brewster Kahle, Kahle/Austin Foundation, George Blood, and George Blood L.P. (“Defendants”) hereby submit this Notice of Errata to correct an inadvertent error present in Defendants’ Opposition to Plaintiffs’ Motion to Compel Discovery (ECF No. 139) and Declaration of Allison Stillman (ECF No. 139-1) filed in support of that Opposition. In particular, the Opposition and the Stillman Declaration contain inadvertent errors related to (i) the number of productions served as of November 20, 2024, and (ii) the dates of those productions.

As of November 20, 2024, Defendants had served four productions, one of which took place on September 20 on behalf of George Blood L.P., and three on October 18, 2024, on behalf of Internet Archive, Brewster Kahle, and George Blood L.P. Together those productions totaled 1,309 documents and 11,336 pages. The Corrected Opposition and Corrected Stillman Declaration attached to this Notice as Exhibits 1 and 2, respectively, have been revised consistent with this information.

As of November 25, 2024, Defendants have made two productions on behalf of Kahle/Austin Foundation—one on November 22 and one on November 25, 2024. As of November 25, Defendants have produced a combined 1,332 documents, totaling 11,720 pages.

1 Dated: November 25, 2024

Respectfully submitted,

2 **LATHAM & WATKINS LLP**

3 /s/ Allison L. Stillman

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